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June 25, 2021

**Via ECF**

The Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Nicholas Truglia*, 19-cr-00921-AKH-1

Dear Judge Hellerstein:

We represent Defendant Nicholas Truglia in the above-noted case and we write on behalf of both parties to respectfully request that the Court adjourn the upcoming pretrial conference, presently scheduled for June 29, 2021. The Government has produced, and we are still in the process of reviewing, voluminous discovery. As well, the parties are in active discussions with respect to a potential disposition of this case, prior to trial. Accordingly, the requested adjournment will allow the defense time to continue to review the discovery materials and allow for both parties to continue their discussions. We jointly seek an adjournment for approximately 60 days until late August 2021.

Should the Court grant the requested adjournment, we understand that the Government requests that the Court exclude time under the Speedy Trial Act between June 29, 2021, and the conference date set by the Court, contending that the ends of justice served by granting such an exclusion outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). We do not object to that request and agree that an exclusion is warranted in order to allow additional time for defense counsel to review discovery and for the parties to engage in further discussions.

Thank you in advance for your consideration of this request.

Respectfully submitted,

/s/ Jeffrey A. Udell  
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Jeffrey A. Udell

cc: AUSA Timothy Capozzi